

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



May 18, 2012

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at Events Related to the Eighth International Conference on Remediation of Chlorinated and Recalcitrant Compounds, May 21 - 24, 2012

On May 22, 2012, the ARCADIS company will host a reception and dinner at the Monterey Bay Aquarium on Cannery Row, Monterey, California from 7:00 pm to 10:00 pm. Approximately 300 guests are expected to attend this dinner. These guests include NASA personnel, personnel from other Federal Agencies/DoD, academia, industry representatives, contractors, sub-contractors and ARCADIS teaming partners. The ticket price to attend this event is \$100 a person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having invited NASA personnel attend. This event will provide an opportunity for NASA employees to share NASA's goals on research and development for the Agency. In addition, attendees will be in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and discussing matters of interest to NASA. Accordingly, NASA employees whose duties do not substantially affect ARCADIS may accept an invitation for free attendance at the event for themselves and their spouses or guest.

NASA employees whose duties may substantially affect ARCADIS, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation of free attendance to the events for themselves and any accompanying spouse or guest.

Jerald D. Stubbs
Agency Designee

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